

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
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In re: LTL MANAGEMENT, LLC, ¹ Debtor.	Chapter 11 Case No.: 23-12825 (MBK) Honorable Michael B. Kaplan

¹ The last four digits of the Debtor's taxpayer identification number are 6622. The Debtor's address is 501 George Street, New Brunswick, New Jersey 08933.

**CERTIFICATION OF PROFESSOR D. THEODORE RAVE IN SUPPORT OF APPLICATION
FOR RETENTION AS EXPERT WITNESS TO THE OFFICIAL COMMITTEE OF TALC
CLAIMANTS EFFECTIVE MAY 19, 2023**

I, **Professor D. Theodore Rave**, being of full age, certify as follows:

1. I am seeking authorization to be retained as a Consultant Expert Witness regarding the multi-district process's tools and ability to efficiently and fairly resolve mass tort claims.
2. My professional credentials include: I am a Professor of Law at the University of Texas School of Law. I have been teaching and writing about complex and multidistrict litigation for the past ten years. I have published numerous articles on federal multidistrict litigation. A full list of my credentials and publications is included on my CV (attached as **Exhibit A**).
3. I am a member of or associated with the firm of: I am a Professor of Law at the University of Texas School of Law at Austin. I am undertaking this retention in my individual capacity, not on behalf of or as a representative of the University of Texas.
4. The proposed arrangement for compensation, including hourly rates, if applicable, is as follows: I agree to be compensated at the rate of \$875 per hour for all time I reasonably expend in connection with the work I perform, including travel time. I agree to be compensated for all time reasonably expended without regard to the opinions I express and without regard to the outcome of this matter. I agree to be compensated for any reasonable out-of-pocket expenses that I may incur in connection with this engagement. I agree to be compensated out of the Debtor's bankruptcy estate only upon the entry of any fee order issued by the Court resulting from periodic fee applications, and on any appropriate fee statements filed consistent with any case orders providing for the periodic payment of professionals.

I agree that I will only seek reimbursement of expenses in accordance with sections 330 and 331 of the Bankruptcy Code, Bankruptcy Rule 2016, the U.S. Trustee Guidelines established by the Office of the United States Trustee, any interim compensation orders, and any other applicable orders of this Court.

☐ Pursuant to D.N.J. LBR 2014-3, I request a waiver of the requirements of D.N.J. LBR 2016-1.

5. To the best of my knowledge, after reasonable and diligent investigation, my connection with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe connection: See no. 6 below.

6. To the best of my knowledge, after reasonable and diligent investigation, the connection of my firm, its members, shareholders, partners, associates, officers and/or employees with the debtor(s), creditors, any other party in interest, their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee, is as follows:

☐ None

☒ Describe Connection:

Through local counsel for the Committee, Genova Burns, I have been provided a list of potentially interested parties in the Chapter 11 Case (the "Interested Parties"). To the extent that information was available, I undertook a detailed, good faith search to determine and to disclose, as set forth herein, whether I have provided or currently provide consulting or expert witness services to any significant creditors, insiders or other parties-in-interest identified by such list in any substantively unrelated matters. The identities of the Interested Parties are set forth on **Exhibit B** attached hereto.

In preparing this Certification, I (or others under my control) searched my records (if available) for the names and matter descriptions of current and previous engagements handled by me. To the extent the information is available, the search identified parties to whom I have provided or currently provide services that also are Interested Parties listed in *Exhibit A*.

To the best of my knowledge and belief, I have not provided, or am not currently providing, consulting services to any Interested Parties in matters unrelated to the Debtor or the Chapter 11 Case. The connections I do have to certain Interested Parties are described on **Exhibit C** to this Certification.

7. To the best of my knowledge, my firm, its members, shareholders, partners, associates, officers and/or employees and I (check all that apply):

☒ do not hold an adverse interest to the estate.

☒ do not represent an adverse interest to the estate.

☒ are disinterested under 11 U.S.C. § 101(14).

☐ do not represent or hold any interest adverse to the debtor or the estate with respect to the matter for which I will be retained under 11 U.S.C. § 327(e).

☐ Other. Explain: _____

8. If the professional is an auctioneer,

a. The following are my qualifications and experience with the liquidation or sale of similar property: _____

b. The proposed method of calculation of my compensation, including rates and formulas, is: _____

Pursuant to D.N.J. 2014-2, I ☐ do or ☐ do not request a waiver of the requirements of D. N. J. LBR 2016-1.

c. The following is an estimate of all costs and expenses, including labor, security, advertising, delivery, mailing, and insurance, for which I will seek reimbursement from the sale proceeds: _____

d. Have you, or a principal of your firm, been convicted of a criminal offense?

☐ No ☐ Yes (explain below)

e. I certify that a surety bond as described in D. N. J. LBR 2014-2(a)(6) is in effect and will remain so through the date of turnover of the auction proceeds.

9. If the professional is an auctioneer, appraiser or realtor, the location and description of

the property is as follows:

I certify under penalty of perjury that the above information is true.

Date: June 7, 2023

/s/ D. Theodore Rave
D. THEODORE RAVE

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